

Message

From: Reaves, Elissa [Reaves.Elissa@epa.gov]
Sent: 10/7/2021 11:48:01 PM
To: Jewell, Shannon [jewell.shannon@epa.gov]
CC: Goodis, Michael [Goodis.Michael@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Thank you Shannon for the note. I am ok with providing an update at the OPP staff on Tuesday so everyone is aware of the meeting agenda on the 26th and who the Divisions want to attend.

Elissa Reaves, Ph.D.
Director, Pesticide Re-evaluation Division
Office of Pesticide Programs
703-305-0312

From: Jewell, Shannon <jewell.shannon@epa.gov>
Sent: Thursday, October 7, 2021 4:48 PM
To: Reaves, Elissa <Reaves.Elissa@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Hi Elissa,

Just spoke with Dan Raichel of NRDC about this and let him know there's little information EPA will be able to provide here, given the status of the petition. He said that's understandable and that they largely just want another opportunity to state their case and add additional clarity about how seed exemptions can have unintended consequences—specifically in CA. And, how this is defeating state regulatory programs for what pesticides are going into their soil.

We added this topic is to the Tuesday 10/12 staff agenda for 5 mins because Mike wanted to revisit, but I can delete that if you think this resolves the issue, and we can gather who else should be invited. Please let me know on this point.

FYI, the meeting is scheduled for Tuesday October 26th 11-12.

Thank you,
Shannon

Shannon Jewell · jewell.shannon@epa.gov
Office of Pesticide Programs, Immediate Office
Cell: (571) 289-9911

From: Jewell, Shannon
Sent: Tuesday, October 5, 2021 2:54 PM
To: Reaves, Elissa <Reaves.Elissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Thanks for this Elissa—I will absolutely let them know.

Shannon

Shannon Jewell · jewell.shannon@epa.gov
Office of Pesticide Programs, Immediate Office
Cell: (571) 289-9911

From: Reaves, Elissa <Reaves.Elissa@epa.gov>
Sent: Tuesday, October 5, 2021 2:23 PM
To: Jewell, Shannon <jewell.shannon@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

I think it would be good for them to know ahead of time so they can set their expectations for the meeting with us.

Elissa Reaves, Ph.D.
Director, Pesticide Re-evaluation Division
Office of Pesticide Programs
703-305-0312

From: Jewell, Shannon <jewell.shannon@epa.gov>
Sent: Tuesday, October 5, 2021 11:59 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Okay, sounds good. Thank you both!

Adding Marietta and Catherine for awareness. You can see the highlighted email below and up for summary.

I will wait to reach back out to NRDC/CDPR until after the meeting next week unless you think I let them know now that EPA will likely be in listening only mode. Please let me know if you think I should go ahead and tell them.

Shannon

Shannon Jewell · jewell.shannon@epa.gov
Office of Pesticide Programs, Immediate Office
Cell: (571) 289-9911

From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Tuesday, October 5, 2021 11:49 AM
To: Reaves, Elissa <Reaves.Elissa@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Thanks – agree with the approach

Let's bring up again during staff meeting next week to confirm.
I know Ed was thinking of also inviting USDA – I think that would be good.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency

Washington, D.C.
571-309-5497 (cell)

From: Reaves, Elissa <Reaves.Elissa@epa.gov>
Sent: Tuesday, October 05, 2021 10:58 AM
To: Jewell, Shannon <jewell.shannon@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Hi Shannon, thanks for following up on this meeting. From my standpoint

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Mike, would you agree or additional thoughts?

Elissa Reaves, Ph.D.
Director, Pesticide Re-evaluation Division
Office of Pesticide Programs
703-305-0312

From: Jewell, Shannon <jewell.shannon@epa.gov>
Sent: Tuesday, October 5, 2021 10:06 AM
To: Reaves, Elissa <Reaves.Elissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: FW: Touching Base on Neonicotinoid-Treated Seeds

Hi Elissa and Mike,

I reached out to NRDC about this meeting, as discussed at the staff meeting yesterday. NRDC said they are hoping to discuss any progress or plans EPA has made regarding the registration and regulation of pesticide-treated crop seeds—i.e., treating them as non-exempt products as opposed to exempt “treated articles,” particularly for seeds treated with neonicotinoids and other systemic insecticides.

Dan Raichel said he/NRDC can provide a little background on the situation in California, where NRDC has petitioned DPR to register/regulate these seeds under state law. And, Karen Morrison said she/CDPR can provide updates on their work on the issue.

Dan Raichel sent the petitions attached as an FYI.

Is this enough information, or are there specific questions you would like me to follow-up with?

Do you want to let me know who else should be added to the meeting from PRD—or should I ask someone else? I think RD should also give names—anyone else I should ask?

Thank you!
Shannon

Shannon Jewell · jewell.shannon@epa.gov
Office of Pesticide Programs, Immediate Office
Cell: (571) 289-9911

From: Morrison, Karen@CDPR <Karen.Morrison@cdpr.ca.gov>
Sent: Monday, October 4, 2021 5:28 PM
To: Raichel, Dan <draichel@nrdc.org>; Jewell, Shannon <jewell.shannon@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Thanks, Dan, and no other significant items to add. We can speak about current status of DPR work on this issue.
Best,
Karen

From: Raichel, Dan <draichel@nrdc.org>
Sent: Monday, October 4, 2021 1:49 PM
To: Jewell, Shannon <jewell.shannon@epa.gov>
Cc: Morrison, Karen@CDPR <Karen.Morrison@cdpr.ca.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

EXTERNAL:

Hi Jewell,

Thanks for reaching out. I'm looping in Karen Morrison who might also have some thoughts re: agenda, but in a nutshell, we were hoping to discuss any progress or plans EPA has made regarding the registration and regulation of pesticide-treated crop seeds—i.e., treating them as non-exempt products as opposed to exempt “treated articles,” particularly for seeds treated with neonicotinoids and other systemic insecticides.

We also can provide a little background in the situation in California, where NRDC has petitioned DPR to register/regulate these seeds under state law. To the extent it's helpful, I am attaching those petitions here (although they are a bit longish).

I hope that's helpful. Again, I'd defer to Karen if there are other agenda items to cover, and would be happy to chat on the phone if you want any more detail.

Best,
Dan
773-319-6376

From: Jewell, Shannon <jewell.shannon@epa.gov>
Sent: Monday, October 4, 2021 2:20 PM
To: Raichel, Dan <draichel@nrdc.org>
Subject: FW: Touching Base on Neonicotinoid-Treated Seeds

Hi Dan,

I'm reaching out on behalf of Ed and OPP leadership to get a little more information about this meeting. Do you happen to have a tentative agenda or can you let me know a bit more about what you're looking to discuss? This came up as we were thinking about who should be invited. If we know a little more, that will help us get the right people there.

If you prefer a call, that is absolutely fine—just want to make sure to get this set up correctly.

Thank you,
Shannon

Shannon Jewell · jewell.shannon@epa.gov
Office of Pesticide Programs, Immediate Office
Cell: (571) 289-9911

From: Raichel, Dan <draichel@nrdc.org>
Sent: Friday, September 24, 2021 4:02 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Karen Morrison, PhD. <Karen.Morrison@cdpr.ca.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; McKamey, Ann <McKamey.Ann@epa.gov>; Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Thanks, Ed,

Looking forward to speaking.

Cheers,
Dan

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Friday, September 24, 2021 2:50 PM
To: Raichel, Dan <draichel@nrdc.org>; Karen Morrison, PhD. <Karen.Morrison@cdpr.ca.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; McKamey, Ann <McKamey.Ann@epa.gov>; Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>
Subject: RE: Touching Base on Neonicotinoid-Treated Seeds

Sure. Ann can help set something up.

Ed

Ed Messina, Esq.
Director, Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Raichel, Dan <draichel@nrdc.org>
Sent: Friday, September 24, 2021 3:39 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Karen Morrison, PhD. <Karen.Morrison@cdpr.ca.gov>
Subject: Touching Base on Neonicotinoid-Treated Seeds

Dear Ed,

Hope this email finds you well, and apologies that its finding you late on a Friday. I'm reaching out because we've been in discussion with the California Department of Pesticide Regulation regarding [our petition](#) to the agency to regulate seeds treated with neonicotinoids and other systemic insecticides as "pesticides" under California law. As we all know, there is a federal dimension to the issue too, and Karen Morrison (cced here) suggested that it might make sense for there to be a larger discussion.

As such, we wanted to see if you (or the appropriate staff) would be available for a video call on the topic in the next couple weeks. If so, please let us know any good times on your end.

Have a great weekend,
Dan

DANIEL RAICHEL
Staff Attorney, Wildlife
Nature Program

NATURAL RESOURCES
DEFENSE COUNCIL

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